Exhibit 8

In the Matter of	)	
	)	
Unbundled Access to Network Elements	)	WC Docket No. 04-313
	)	
Review of the Section 251 Unbundling	)	
Obligations of Incumbent Local Exchange	)	CC Docket No. 01-338
Carriers	)	

DECLARATION OF M. SUE KEELING ON BEHALF OF
GENERAL COMMUNICATION, INC.

1.   My name is M. Sue Keeling, and I am Director of Local Service for General

Communication, Inc. ("GCI"). In that capacity, I am responsible for the processing of GCI

orders, the provisioning of services, coordination of premise related activities, customer

management through conversions and moves, and compliance and development of

operational agreements and practices between GCI and ACS. I have held this position since

June 1998. Recently my focus has shifted to the area of local services OSS and provisioning

requirements; however, my current duties require continued familiarity both with GCI's

internal order process and ACS order processing and provisioning performance.

2.   I was the internal lead on operation issues associated with the interconnection

negotiations and arbitrations for GCI's local service entry into the Fairbanks and Juneau

service areas. I am also very familiar with the Anchorage interconnection agreement and

"back office" processes. I also managed the GCI negotiation with ACS to establish performance metrics for processing and provisioning in March 2004.

3.   In my declaration, I will explain why the FCC should establish a default batch hot cut process. To ensure successful and timely customer conversions, it is critical that a default batch cut process include coordination, notification, and performance requirements, and prohibit any order provisioning caps. In GCI's experience, without a workable hot cut process, customers face delays and outages that raise issues of customer satisfaction and even safety, leaving the CLEC subject to the whims of the ILEC in getting its customers turned up. Without coordinated efforts closely linking ILEC actions and subsequent CLEC actions, customers are at risk of loss of service. Adoption of a defined process will improve predictability and timelines, and help improve the customer's experience as well as a CLEC's ability to utilize their own installed switch facilities.

The Need for Batch-Cut Provisioning

4.   A batch cut process is essential to any facilities-based CLEC's ability to timely serve customers and to maximize utilization of its investment in local service facilities. For GCI, the ILEC process for scheduling and performing the "hot cut" by disconnecting a loop from its switch to be connected with GCI's switch has been, in the past, inconsistent and uncoordinated. In my position, I have seen first hand that the absence of a stringent, adhered to hot cut process has denied customer's "timely service by the carrier of their choice."

5.   Customers wishing to transfer to GCI have historically experienced significant delays and, at times, outages while having their orders filled. These problems do not occur when the ILEC schedules and provisions its own customers' orders. In my experience, these

delays are typically due to failures of the initial order processing procedures and/or a failure

of the order provisioning procedures. Most problems resulting from provisioning

principally have been due to the ILEC's failure to adhere to procedures agreed to between

the parties with respect to the disconnection of a customer loop from the ACS switch so it

can be connected to the GCI switch (the "hot cut"). ACS generally does not notify GCI and

coordinate in advance of performing hot cuts or after such work has been completed.

6.   Problems with notification and coordination procedures have primarily affected

those customers that GCI could serve by UNE-loop via its own switching facilities. Service

for these customers must be provisioned via a hot cut by transferring the loop from the ILEC

switch to the CLEC switching facilities. The term "hot cut" refers to the fact that the line

being moved from one carrier switch to another is a "live" line, so that while the process is

underway, the customer experiences one minimal—hopefully unnoticed—service

disruption.

7.   From GCI's experience as a local services provider, there are a number of order

types that require a hot cut (also referred to as loop provisioning or jumper swing), such as:

Customer Conversion – A CLEC submits an order requesting that the ILEC switch a

customer (who is presently a customer of a carrier other than the CLEC) to the

CLEC. The order to the ILEC can be an order for number porting and/or a UNE

loop, UNE-P, or TSR (resale), depending upon how the CLEC provisions service to

its customer. The CLEC order for a UNE loop (which would include an associated

number port) requires a "hot cut."

Provisioning Change – The CLEC submits an order to the ILEC to switch the mode by which the CLEC provides service to that CLEC customer. The ILEC may receive an order for number porting and/or for a UNE loop, UNE-P or TSR, including any features and a request to discontinue the CLEC's prior mode of service. Common provisioning changes include moving a CLEC customer from resale service to UNE-L, UNE-P, or entirely over CLEC-deployed facilities; from UNE-P to the CLEC service over an ILEC unbundled loop in conjunction with other CLEC facilities or service entirely over CLEC-deployed facilities; or from CLEC service over an unbundled loop in conjunction with other CLEC facilities to service entirely over CLEC-deployed facilities. A provisioning change from resale or UNE-P to UNE-L requires a "hot cut."

New Install – The CLEC submits an order requesting that the ILEC initiate service for a new CLEC customer or add a line for an existing CLEC customer. The CLEC's order to the ILEC may be for an unbundled loop, for UNE-P, or for TSR. A new install for an unbundled loop requires a "hot cut." Though the line is not "live," it still requires that the loop be swung from the ILEC switch to the CLEC switch.

Move – The CLEC submits an order requesting that the ILEC shift service for a current CLEC customer from an existing location to a new location, if either or both locations are served by the CLEC using UNE-L, UNE-P, or TSR. The CLEC's order to ILEC may be for an unbundled loop, for UNE-P, for TSR, and/or, if the new

location is served entirely over CLEC facilities or UNE-L, for number porting. A move involving UNE-L, either to the old or new location, requires a "hot cut."[1]

8.	The daily volumes of such orders can add up. In GCI's experience, ACS provisioned an average of 110 hot cut orders per day in 2004 from January through June in Anchorage, Fairbanks, and Juneau combined. Hot cut problems are likely to be exacerbated with an increase in order volumes requiring a necessary increase in notification and coordination between the ILEC and CLEC. When GCI rolled out service in Anchorage, for example, some customers experienced delays of three to six months. Delays of five weeks and more were the norm when GCI initiated service in Juneau and then Fairbanks, forcing GCI to stage its service roll-out in Fairbanks by zip code. This correlation between increases in CLEC orders and the ILEC's increased inability to timely complete orders demonstrates that a hot cut process that is not working seamlessly can impair a CLEC's further facilities-based competitive entry. It is equally critical, therefore, that orders for loop disconnects for a CLEC (in order for the CLEC to self-provision a loop) must follow the same notification and coordination procedure as for the other hot cut order categories.

9.	In July of 2004 GCI asked ACS to handle a migration of TSR customers to UNE-L and UNE-P for the Fairbanks and Juneau areas. Though planning was done between the parties, again, the process was not followed, resulting in these conversion orders exceeding the timelines established between the parties. In my experience, orders at this volume have resulted in significant backlogs and delays in the absence of a coordinated batch cut process,

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[1] Other order types include feature changes and disconnect or reconnect. These order types (when standing alone) do not require a "hot cut."

which may be alleviated—though possibly not entirely resolved—through a mandatory batch cut process.

10. In GCI's experience, the timeframes for order due dates from the ILEC have not been firm, making it very difficult, and at times impossible, for GCI to share with its customers reliable install dates and to coordinate hot cuts and confirm order completion with ACS technicians. For example, ACS currently schedules its technicians' time using "work units." The technicians are the personnel who perform the physical function of disconnecting customer loops that are being converted to GCI from the ACS switches in the ACS central offices so such loops may be hard-wired to the GCI switch. Work units are used to calendar the time it takes to accomplish tasks by technicians in the field and in central offices. Work units were not used to assign or limit central office work until the last year to eighteen months.[2]

11. If ACS schedules one work unit, or six minutes, for provisioning an order requiring a jumper swing in the central office (as is my understanding), it would take 20 work units—or two hours—for a single technician to complete 20 GCI customer conversion orders by completing 20 jumper swings in a single central office facility. This volume corresponds with the daily volumes that GCI has recorded, but in no way represents the volume that *could* be performed and reductions in the provisioning timeframes that could be achieved without this scheduling constraint.

12. It actually takes approximately two to three minutes for a technician to complete a jumper swing. In fact, in 1997, ATU (the predecessor to ACS) agreed to make "every

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[2] ACS also has assigned GCI work to its "Network Operations Center" or "NOC", but it is not clear whether work units apply to this group.

effort" to complete jumper work within three minutes, and both jumper and provisioning work within 20 minutes. At this rate, an ILEC could perform 20 to 30 jumper swings per hour for each site, for a total of 480 to 720 loop jumper swings per site per day. But volumes do not even approach this level when arbitrary limits are imposed, as ACS had done, previously limiting the number of GCI unbundled loop orders it would process, setting a 20 order per site limit per day in Anchorage, a 10 order per site limit per day and a 20 order per site limit per night in Fairbanks, and a 5 order per site limit per day and a 10 order per site limit per night in the Juneau central office. ACS unilaterally imposed each of these limits, without GCI's agreement.

13.   ACS has also previously indicated to GCI that there are limits on the number of work units available per day for GCI orders. Any limitation—whether based on order numbers or some portion of work units—reduces the number of hot cuts that the ILEC performs for the CLEC, relative to the orders the ILEC provisions for its own customers. Additionally, in my experience, ACS has refused to schedule and perform hot cuts for GCI customers in the same manner that ACS schedules and performs central office work for its own customers. To address this inequity, the FCC must establish a default hot cut process, including to the extent possible, orders grouped in batches.

The Procedure Required for Coordinated "Hot Cuts"

14.   In the state case before the RCA, GCI proposed a batch cut process to help reduce instances of customer delays and outages caused by deficient customer conversion practices. This process is laid out in Exhibit MSK-1, attached hereto.

15.   This process includes two key components for any default batch cut process: notification and coordination. This process must be followed for every hot cut, but the coordination and notification may be simplified if undertaken in a "batch".

16.   **Notification and Coordination.** As an initial matter, the ILEC assigns a due date once it processes a CLEC order and issues a "Firm Order Commitment" ("FOC"). Once the CLEC receives a FOC, the following steps are required to swing the customer loop (or perform the hot cut):

- On the designated day and time, an ILEC technician is to call the CLEC technician to coordinate a set of lines to be converted from the ILEC switch to the CLEC switch in the relevant collocation site.

- Upon contact and coordination, the ILEC technician is to proceed with the jumper swings.

- Next, the ILEC is to advise the CLEC technician by facsimile (or other electronic means) when the planned series of jumper swings and porting is complete.

17.   If this process is not followed, hours of delay may result between the ILEC actions and the required CLEC follow-up actions with the possibility of customer confusion and potential outages. As is the case with GCI's experience currently, problems arise when the ILEC does not notify the CLEC prior to performing the conversion. The ILEC should be required to place the pre-jumper work call immediately prior to performing the work. The CLEC cannot coordinate with the ILEC to avoid outages (with the potential to interrupt

business or the ability to make vital, emergency calls) unless the ILEC provides sufficient notice of the work to be performed.

18.   For GCI today, even when a CLEC receives notification, it is often not accompanied by any information about which lines are being worked, and in what sequence. The ILEC should be required to notify the CLEC before the line is swung, including identification and sequence of the lines themselves.

19.   Once the work is completed, notification should be immediately followed by EMAIL, facsimile, telephone call or other electronic means so that the CLEC can commence with connecting the customer loop. By way of example, GCI estimates that it does not receive over 25 of the completion notices per day within the agreed upon 2 hour window, once the loop work has been performed. If GCI has not received a completion notice by mid-afternoon (or perform and receive a valid line test by 7 P.M. on "Field Orders" as designated by ACS) for any order scheduled for a particular day, GCI then has to follow-up with ACS directly to determine the status of such orders. If ACS completed the order earlier in the day—and most A.M. shift orders are completed in the morning—then the customer's service may have been affected for that entire period of time. Many times, GCI only learns of the outage when the customer complains. This is not only a significant customer relations matter for the CLEC, but more importantly it is a matter of public interest and safety for consumers to have available a working local line.

20.   As such, notification from the ILEC has to give the CLEC sufficient lead-time to confirm completion of its side of the hot cut. What GCI technicians have found in some cases, is that by the time GCI receives notice that the ACS task has been completed and

notice is provided, the ACS technician has since vacated the wire center or field site. Therefore, once GCI validates the hot cut work and identifies a problem, there is no way to contact the technician on the spot to re-check the trouble. GCI then has to submit a trouble ticket and reschedule an ACS visit before the problem can be resolved. This results in longer customer outages than necessary and the need to re-schedule an ACS technician to trouble-shoot and complete the order, and generally requires a second attempt by the GCI technician as well. These repeated steps are inefficient, precluding the working of a new order within that timeframe, and limiting the total number of orders that ACS works. Therefore, the loop provisioning cannot be considered complete until both the ILEC and CLEC personnel have signed off on the order upon completion of their respective tasks. To meet this requirement, the ILEC must make available personnel to correct immediately any service problem associated with the hot cut, notify the CLEC of any circumstance having a negative impact on service, and notify the CLEC when the ILEC completes the work. Then the CLEC can test and validate the service to confirm the successful completion of the hot cut before the ILEC closes the service order.

21.   It is important to note that these provisions do not impose requirements greater than what the ILEC does for itself. When the ILEC converts a customer from the CLEC to the ILEC, the ILEC has control over the physical connections in the central office, makes sure that its technicians are available to test service, and ensures that the connection is operating correctly following the conversion of the loop from the CLEC to the ILEC switch. An ILEC would never leave its accounts in limbo on a conversion from the CLEC, so it should not leave an order incomplete on a conversion from the ILEC to the CLEC.

22. A successful batch hot cut process must also include steps if the hot cut is unsuccessful for any reason. In GCI's experience, if a hot cut fails today, two unacceptable outcomes may occur. First, the ILEC may simply count the order as completed, even though the customer is left without dialtone. The result is no service for the customer. A second, but not mutually exclusive possibility is that the order is rescheduled and simply goes to the "back of line", behind all orders that the CLEC, the ILEC, and other CLECs have since submitted but have not yet been provisioned. This causes further delays for a customer that is already without service. Neither of these outcomes is acceptable.

23. Instead, the batch cut process should include affirmative set procedures for those instances when the order is not successfully completed. At such time that either the ILEC or CLEC learns of an unsuccessful process, then the order should be included in the next immediate batch for that service area. Specifically, the ILEC should allow direct communications between the CLEC and wire center technicians and/or network operations center technicians regarding an open order or trouble ticket. The ILEC must have personnel available to immediately correct any service problem associated with a customer conversion, contact the CLEC to complete conversion orders, and contact the CLEC upon order actions that could affect customer dial tone, features, or call receive/send capability.

The Number of "Hot Cuts" To Be Performed in a Batch

24. Equally disruptive to a CLEC and its customers is that the on-going failure to coordinate hot cuts can leave customers without dial-tone either because service has not been installed or because the ILEC disconnected the customer from its own switch without providing any notice to the CLEC that the loop was "ready" for service via the CLEC's

switching facilities. These service delays or disruptions often occur because the ILEC has not notified the CLEC of orders completed, or coordinated with the CLEC to move the jumper and unprovision the switch or unport the number and move the jumper. Such obligations and timeframes must be adopted as part of any batch cut process to avoid service delays and disruptions, and to permit a CLEC the use of its own switching facilities.

25.   Given the close coordination required to avoid customer outages and delays, GCI proposes that the ILEC, in non-BOC markets, schedule up to 10 conversions (counted on a customer basis) to be performed in a batch.[3] Again, this process would not appear to require any more than what the ILEC does for itself. GCI does not believe that an ILEC would hold its customer orders to create a minimum number before they are worked.

A "Hot Cut" Provisioning Metric Should Be Required

26.   GCI also urges the FCC to require parties to establish a metric for hot cut provisioning. If an ILEC is required to provision a hot cut—whether the order is for a customer conversion, line addition, customer move, or provisioning change—within a certain timeframe, then it will be much easier for both parties to schedule their respective technicians that are necessary to complete the order. Though such a metric may have been established in some markets as a result of Section 271 processes, CLECs dealing with non-RBOC ILECs did not have this same opportunity. For example, GCI and ACS have only

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[3] GCI notes that due to the ACS network configuration and the number of lines in Anchorage, Fairbanks, and Juneau respectively, there will likely be times when fewer than 10 conversions will be called for at one time in a particular site. As such, for each visit by an ILEC technician, telephonic notice of the conversions to be performed must be provided no later than 30 minutes in advance of the work to be performed, and facsimile notification confirming the completion of the work and the lines for which the work were completed (identified by telephone number) should be provided immediately upon completion of the batch and well before the ILEC technician departs the site so that the CLEC can confirm correct completion and contact the technician at the site if a problem is found.

recently established performance standards. Thus, the Commission should require parties to establish batch cut provisioning standards as part of the interconnection negotiation and arbitration process.

27. As outlined here, the inclusion of these steps – coordination, notification, and performance standards – must be incorporated into any default batch hot cut process in order to reduce customer confusion and outages and to help CLECs maximize the utilization of deployed switching and collocation investments. None of these proposed components of a batch hot cut process require the ILEC to do anything more for a CLEC customer than it already performs for its own customers.

This concludes my declaration.

Declaration

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September ___28___, 2004

M. Sue Keeling

Conversions Requiring Jumper Swings

The conversion activity will proceed as follows:

- The ACS Technician will call the designated CLEC "can be reached number" on the date agreed upon when the CLEC order was placed, no more than 30 minutes prior to the work to be performed.
- The two technicians will agree on the first series of orders to be converted. A series of orders generally shall not exceed 10, but in all instances the orders common to a single customer shall be worked in the same batch, even when the volume exceeds 10.
- ACS will proceed with the jumper swings.
- ACS will advise the CLEC Technician via facsimile when the series of jumper swings is complete and proceed with porting the numbers. This activity should be immediate.
- Service interruptions for customers shall held to a minimum, not to exceed 5 minutes.
- The CLEC will test and validate the service to confirm the successful completion of the hot cut before ACS closes the service order.
- ACS will make available personnel to correct immediately any service problem associated with the jumper swing, notify the CLEC of any circumstance having a negative impact on service, and notify the CLEC when ACS completes the work.
- If either ACS or the CLEC learns of an unsuccessful process, then the order shall be included in the next immediate batch for that service area. In a WC that has minimal orders, or for orders in the last batch of the shift in that WC this could be interpreted to mean next day.
- The jumper swing may not be counted as complete until both ACS and CLEC personnel have signed off on the order upon completion of their respective tasks.